

Tab 11

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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HOLLY MARIE HUMMEL, on behalf of)	No. 07 CIV 5473 (VM)
herself and others similarly situated,)	
)	DECLARATION OF DEBRA VENTURA
Plaintiff,)	IN SUPPORT OF DEFENDANT'S
)	MOTION FOR SUMMARY JUDGMENT
-against-)	
)	Judge: Victor Marrero
ASTRAZENECA LP,)	
)	
Defendant.)	
-----	x	

I, Debra Ventura, state as follows:

1. Except where otherwise noted, I make this declaration based on my personal knowledge and, if called by a court of law, could and would competently testify to the facts set forth herein.

2. I have been employed by defendant AstraZeneca LP ("AstraZeneca") or a predecessor company in various capacities since 1986. I currently am AstraZeneca's Director of Sales Training.

3. AstraZeneca is engaged in the business of research, development, and manufacturing of pharmaceutical products designed to fight disease in major areas of healthcare. AstraZeneca employs thousands of individuals, including a field-based sales force of Pharmaceutical Sales Specialists, who are responsible for selling the portfolio of AstraZeneca products.

4. Like all Pharmaceutical Sales Specialists, Hummel was eligible to earn incentive compensation. The incentive compensation a Pharmaceutical Sales Specialist can earn is based, among other things, on the Pharmaceutical Sales Specialist's achievement of sales objectives

during the plan year. The financial component of the incentive award is intended to compensate Pharmaceutical Sales Specialists based on achievement of sales targets and product sales within their assigned geography. Each product is weighted differently, and the Pharmaceutical Sales Specialist's sales objectives for each product may be based on different metrics, such as market share growth or dollar volume growth for each product within the Pharmaceutical Sales Specialist's assigned sales territory.

5. Pharmaceutical Sales Specialists earn an annual base salary. Based on my review of Company payroll records maintained by AstraZeneca in the ordinary course of business and prepared by persons with knowledge of the information contained therein, Hummel earned an annual base salary of \$50,158 effective November 1, 2001; \$52,164 effective March 1, 2002; \$54,251 effective September 1, 2002; \$55,878 effective November 1, 2002; \$56,996 effective March 1, 2003; \$61,342 effective September 1, 2003; \$63,796 effective March 1, 2004; and \$68,000 effective August 1, 2004 through Hummel's termination of employment on or about October 15, 2005.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 28, 2008 in Wilmington, Delaware


Debra Ventura